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8
9 **SAN FRANCISCO BAY CONSERVATION AND DEVELOPMENT COMMISSION**

10 In the matter of:

11 VIOLATION REPORT/COMPLAINT FOR THE
12 IMPOSITION OF ADMINISTRATIVE CIVIL
PENALTIES, ENFORCEMENT FILE NO.
13 ER2013.009 AND PERMIT FILE NOS.
14 1985.019.22A, 1985.019.09B; SCOTT'S JACK
LONDON SEAFOOD, INC. AND THE PORT OF
OAKLAND

DECLARATION OF MICHELLE LEWIS

1 I, Michelle Lewis, declare:

2 1. I am the founder and Director of Development for Northern Light School. I have
3 personal knowledge of the following facts and if called as a witness, could, and would, competently
4 testify thereto.

5 2. We first opened Northern Light School on September 11, 1989, on Redwood Road in
6 Oakland.

7 3. Our school seeks to provide a private-school level education for children of families who
8 are unable to afford most private schools. As a result, we rely heavily on our fundraising efforts. Our
9 annual gala ball and auction, for example, typically provides a quarter of our entire annual fundraising
10 goal. When Ray learned that our school relied so heavily on fundraising, we discussed hosting the gala
11 in the pavilion at Jack London Square. Ray, in his typical generous fashion, provided dinner and wine
12 for our guests at no cost. The pavilion has enabled us to host our guests at the waterfront, which has
13 allowed us to properly honor our guests and enjoy the beauty of the Bay with the people we care about
14 the most. Many people who attend our functions are introduced to Jack London Square for the first
15 time thanks to Scott's hosting our events.

16 4. I first met Ray Gallagher in October 1989, shortly after Northern Light School opened.
17 We had just learned that in order to open our school, we would have to build a fence around the entire
18 property, which would cost \$10,000. We had spent all of our money launching the school and were
19 unable to afford this. Shortly after I met Ray and told him about our school and the fence situation, he
20 generously offered to pay for the fence himself. The fence was built within a week, and we were able
21 to open. I do not know what we would have done without Ray and his selfless generosity. To this day,
22 the children at our school know about "Ray's Fence" and recognize the role that Scott's and the
23 Gallagher family played in our school's history.

24 5. Even after our organization grew too big to hold our gala in the pavilion, Ray attended
25 our gala at its new location and donated \$10,000 to our school.

26 6. Even though we no longer host our gala at the pavilion, we have partnered with Scott's
27 to host an annual dinner in the pavilion for all of the new parents at our school. This event is important
28 for us to thank these families for believing in our school's vision and for entrusting us to care for and

1 educate their children. Ray generously donates food and drinks to make this event possible.

2 7. Ray, Liz, and the whole Scott's/Gallagher family also participate annually in our Vida
3 Blue celebrity invitational golf tournament by providing shrimp cocktails and wine for over 250 golfers
4 and volunteers. We rely heavily on this event, and Ray's generosity enables us to host such a
5 successful tournament.

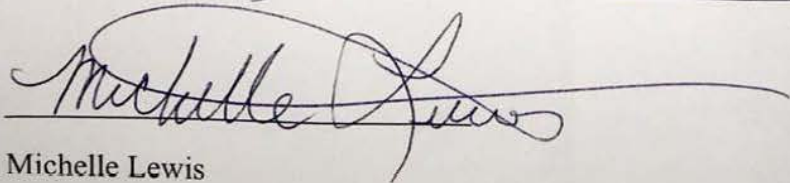
6 8. When Cornell Maier, former CEO of Kaiser Aluminum and a big benefactor to our
7 school, turned 80 years old, Scott's hosted an incredible dinner for him and 200 of Cornell's dearest
8 friends and dignitaries from around the Bay Area. It was an incredible event and meant a lot to us and
9 everybody whose life has been made richer by Cornell's charitable work.

10 9. It is my understanding that when Scott's hosts our events, they are operating these events
11 at a financial loss as a charitable donation to our school. Thanks to donations like these, we are able to
12 continue to host these events and continue operating.

13 10. Ray's generosity toward our school has continued strongly in the decades since we
14 opened. In particular, Ray sponsors one of our students through a scholarship program that Cornell
15 Maier began. Ray pays for the education costs of one of our students, including her uniform, field trip
16 fees, and other additional costs. As it happens, the little girl that Ray sponsors is the daughter of one of
17 our original 12 students, who were saved when Ray stepped in to build his fence. Ray's commitment to
18 our organization through the years has been remarkable.

19 11. We fully support Scott's restaurant and hope that the commission does not penalize them
20 for helping us. We rely heavily on Scott's altruism and would be crushed if Scott's is punished because
21 of the time, effort, and resources they have donated to the Bay Area's children.

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23 I declare under penalty of perjury that the foregoing is true and correct and that this declaration was
24 executed on this 23 day of January, 2017, at Oakland, California.

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26 
27 Michelle Lewis
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